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ATTORNEY FOR DEBTORS

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In Re

Anthony Mayoros, Sr. and  
Sandra Mayoros,

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Case No. 18-35206 (MBK)  
Chapter 13

REVISED CERTIFICATION IN SUPPORT OF  
MODIFIED PLAN AND IN OPPOSITION TO  
TRUSTEE'S CERTIFICATION OF DEFAULT

Hearing Date: March 2, 2021  
Oral Argument: Requested

Debtors.

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Anthony Mayoros, Sr. and Sandra Mayoros certify as follows:

1. On February 23, 2021, we filed a certification in support of our modified plan and in opposition to the Trustee's certification of default (docket 61 and 62). We just settled the mortgage company's certification of default (docket 56). A consent order is about to be entered that will add \$9,523.26 post-petition mortgage arrears to our plan. This will increase our Trustee payments by about \$180 a month.

2. The Trustee objected to our modified plan and filed a certification of default based on:

a) arrears: we paid \$980 on January 13, 2021 and a payment of \$560 is in transit.

We expect to pay \$585 before the hearing date. We are on track to complete our modified plan on time;

b) plan objection by MidFirst Bank: a consent order was entered on December 23, 2020 (docket 54). The consent order does not impact plan payments;

c) updated proof of income: pay stubs were uploaded to the trustee's web site on February 11, 2021;

d) disposable income: we believe our budget is fair based on our income and family size. Both of our incomes have been impacted by COVID. Right now, we are both working full time hours. This may change depending on the continuing impact of the virus and economic recovery. For example, Sandra's hours were previously drastically reduced because of her employer's work flow and Anthoney's job is dependent on Six Flag's ability to resume normal operations;

e) threshold: we agree to pay a minimum of \$1,570 to unsecured creditors:

MidFirst Bank	\$16,288	(remaining pre-petition arrears)
MidFirst Bank	\$9,523	(post-petition arrears)
Priority NJ Tax	\$3,234	
Priority IRS Tax	\$8,688	
Unsecured Creditors	\$1,570	(threshold)
Attorney Fee	\$1,500	(estimated pending fee app)
Sub-Total	\$40,803	
Trustee Commission	\$4,533	
Sub-Total	\$45,336	
Balance on Hand	-\$920	(excluding payment(s) in transit)
Balance to Complete	\$44,416	

Our plan payments going forward will be \$765 a month for 58 months.

f) 2019 tax return: uploaded to the trustee's web site on February 11, 2021.

3. We request that our modified plan be confirmed and that the trustee's certificate of default be denied.

4. We certify under penalty of perjury that the foregoing is true and correct.

Date: February 25, 2021

/s/Anthoney Mayoros, Sr.

Date: February 25, 2021

/s/Sandra Mayoros